

The following are the essentials of our governance policies.

The “Code of Business Ethics” applies to all employees of Haitian International, its wholly-owned subsidiaries and joint ventures in which it holds a controlling stake, including directors, management staff and employees, as well as partners such as suppliers and customers. Below are excerpts from it:

Business Ethics and Integrity

- The company shall strictly observe the code of business ethics and integrity in its daily operations and prohibit any form of bribery, extortion and corruption, including but not limited to the company's customers, suppliers, rivals, employees and other stakeholders. The company shall treat others fairly and shall not manipulate, conceal, abuse privileges, misrepresent material facts or do any other unfair transaction to take advantage of others or obtain improper benefits.
- We shall do our best to comply with all applicable laws, regulations, corporate policies and ethics and not limited to the narrow meaning of the law, conduct all of our business with integrity and fairness, to avoid any conflicts of interest or undue influence. At the same time, when conducting business transactions, we shall not falsely describe the quality, features and prices of our products or services.

Corruption and Bribery Are Forbidden

- The company shall strictly require its employees, suppliers or related parties to abide by the “Anti-Unfair Competition Law of the People's Republic of China”, “Anti-Money Laundering Law of the People's Republic of China”, “Provisional Regulations on Prohibition of Commercial Bribery” and other national anti-corruption laws and regulations, and establish relevant internal documents including: "Supplier Integrity Commitment", "Code of Ethics for Employees", etc., and set up an anonymous whistle-blower system to prevent the company from corruption and bribery in any of its operating areas.
- Bribery may take the form of, including but not limited to, cash, cash equivalents, payments, commissions, benefits in kind or other benefits, except gifts received in return during festivals. Employees of the company are strictly prohibited from offering or accepting bribes, including but not limited to implying or soliciting bribes or proposing conditions, and employees are also prohibited from doing such acts through any organization or person.

Restrictions on Gifts and Entertainment Activities

- Small gifts and entertainment are offered or accepted in the course of business dealings between companies and employees, usually for the purpose of establishing relationships, showing politeness, etc. Gifts and entertainment activities can establish friendly relations between companies and employees. However, when offering or accepting gifts or entertainment to or from any person, the company must exercise proper judgment and caution, abide by the principle of appropriateness, to avoid affecting the company’s objective business decisions.
- We can offer or accept low-value goods that are normally on sale and simple meals. However, gifts, favors or entertainments shall not be given or accepted if such acts will result in or are likely to affect the company’s interests. At

the same time, it is our responsibility to ensure that agents or other organizations providing gifts or entertainment activities on our behalf comply with our guidelines.

- Haitian prohibits all forms of bribery, giving or accepting inappropriate gifts of high value or activities that affect the company's business decisions.

The “Anti-Bribery Policy” applies to all operations of the company, including those conducted by all Haitian subsidiaries, agents, distributors, suppliers or other representatives and any joint venture in which Haitian is a participant. Below are excerpts from it.

The reputation of Haitian International Holdings Limited (Haitian) depends on how we run our business. All employees and agents of the company must comply with all applicable laws and regulations in the place of business operation. We want our partners and employees to know that we conduct our business ethically at all times. If an unethical practice is illegal but acceptable in a country, it does not mean it is acceptable to Haitian. Failure to comply with the anti-bribery law will cause very serious consequences for Haitian.

Therefore, Haitian will punish any employee who breaks the anti-bribery law. All employees must bear in mind that your career will not be affected if your performance declines as a result of conducting business in an ethical manner. Please read this manual carefully. If you suspect Haitian is not complying with the anti-bribery law of your country, you must promptly alert the leaders in charge or report it.

Purposes

The anti-bribery policy of Haitian is designed to:

1. Prevent improper payments or other criminal motives;
2. Provide guidance to all Haitian employees on anti-bribery laws around the world.

Many anti-bribery measures and laws are aimed primarily at public officials. At Haitian, we believe that all business transactions are equally important. In some cases, we understand that employees must be more vigilant about misconduct, including when dealing with public officials entrusted with investments of public money.

Policy

All Haitian employees shall conduct the company’s business in a legal and ethical manner. At Haitian, illegal payments, bribery, kickbacks or other suspicious acts affecting any business transactions shall not be allowed. Haitian expressly forbids bribery by any employee or agent.

This Policy applies to all operations of the company, including those conducted by all Haitian subsidiaries, agents, distributors, suppliers or other representatives and any joint venture in which Haitian is a participant.

Application of the Policy

The basic elements of the anti-bribery law include making payments to, giving or promising to give, any economic goods to individuals holding certain positions, thereby influencing their procurement decisions, or offering “benefits” in the knowledge that all or part of the payments would be gifted to persons influencing procurement decisions.

There is barely any criterion for “economic goods”. In addition to cash or other forms of monetary compensation, it can be almost any form of direct or indirect patronage.

Examples of possible violations of international anti-bribery laws include:

- Arrange trips
- Arrange meals
- Donate to charity at the customer's behest
- Provide job opportunities for family members of customers
- Award scholarships to family members of customers
- Provide tickets for sports events

Please note that the above are only examples of potential improper inducements and not the range of application for the ban on bribery.

As a global company, Haitian employees often interact with foreign officials. Employees communicate with government officials on relevant public contracts or permits and other required government approvals such as customs declarations, business licenses, safety/environmental permits. In some countries, government officials may claim improper payments in the process. In such cases, international anti-bribery laws must be observed.

Most international anti-bribery laws prohibit improper payments or improper provision of funds made by individuals, especially to public officials. Therefore, in most cases, it does not matter whether the recipient actually accepts an improper inducement. The recipient doesn't have to accept the improper payment or even to inform the briber of his/her intention to do so. In contrast, improper payments or promises to make improper payments to public officials fall under the category of prohibited conduct.

The purpose may be not only to make a direct purchase, but also to induce an individual to perform or refrain from performing any act in breach of statutory obligations;

In addition, anti-bribery laws generally prohibit direct or indirect payments to public officials. Therefore, Haitian shall be liable for any improper transfer of all or part of the funds by its agents, distributors or other partners to advisers or consultants to officials or persons acting on behalf of the government.

Therefore, no Haitian employee shall make payments, promises or authorizations to third parties (such as agents, distributors or consultants) that are likely to improperly pay all or part of the funds to an official.

The “Whistleblowing and Whistleblower Protection Policy” applies to Haitian’s any current or former senior staff (including directors), employees (including long-term, part-time, regular or temporary employees), suppliers, contractors or advisors (including any of their employees) and any of these individuals’ current or former relatives, dependents, or spouse. Below are excerpts from it:

Whistleblower Protection Policy

- Any whistleblower who discloses or reports misconduct will be protected by this policy without fear of retaliation, persecution, or mistreatment. The whistleblower shall have the right to report to his/her supervisor if he/she suffers retaliation (including connivance, covering up or bribing, or instigating others to retaliate against the whistleblower). If it involves the supervisor, the whistleblower has the right to report to Haitian’s Internal Control Headquarters or designated external independent legal counsels. Those who have violated the law as determined by judicial organs shall be handed over to judicial organs for investigation of corresponding legal responsibilities.

Confidentiality and Anonymity

- Haitian will take reasonable measures to keep your complaints and reports strictly confidential, and only disclose information related to your identity or information that can be used to identify you based on the following principles: such disclosure has been approved by you in writing or is permitted by law. Haitian will treat all complaints and reports received with caution and seriousness. In addition, Haitian will:
 - (a) Restrict access to information related to your report;
 - (b) Review some aspects of your report carefully and perhaps de-identify them.
- You have the right to raise any problems you encounter as a result of your report and request Haitian to take positive action, including any breach of confidentiality that you believe or suspect. All issues shall be discussed directly with the Internal Control Department to ensure that your problems are addressed in a timely manner.
- To assist with any possible investigation into your report, Haitian encourages you to agree to disclose your identity. However, you may choose to remain anonymous throughout and after the investigation on your own terms, subject to the local laws and regulations in your country/region. Haitian will investigate your report in the same manner. Unless required by law, your written consent is required before disclosing your identity (and any information that may result in your identity being disclosed). But anonymous tip-offs are hard to follow up, and it is difficult to confirm whether the informers are prepared to reveal their names later.

List of Haitian Group's governance policies (for full information on our policies in detail, please contact us).

No.	Name of Policy
1	Code of Business Ethics
2	Code of Ethics for Employees
3	Anti-Bribery Policy
4	Anti-Fraud Policy
5	Management System for Conflicts of Interest Among the Management
6	Management System for Conflicts of Interest Among Employees
7	Whistleblowing and Whistleblower Protection Policy
8	(Others)